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RADIO EMERGENCY ASSOCIATED CITIZENS TEAM OF THE GOLDEN GATE AREA, INC.

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May 14, 1998

Office of the Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC. 20554

Dear Secretary

Enclosed you will find one (1) original and five (5) copies of my "Comments to a Notice of Proposed Rule Making" WT98-20

Please see that the Commission receives these comments.

Yours truly

Kerry D. Cochran
President

ENC:

No. of Copies rec'd 045
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554

In the Matter of

Biennial Regulatory Review
Amendment of Parts 0, 1, 13,22,
24, 26, 27, 80, 87, 90, 95, 97, and 101
of the Commissions Rules to Facilitate
the Development and Use of the Universal
Licensing System in the Wireless
Telecommunications Services.

WT Docket No. 98-20

RECEIVED
MAY 19 1998
FCC WASHINGTON, DC

Comments to a Notice of Proposed Rule Making

Filed by: Name: REACT of the Golden Gate Area, Inc.
Address: P.O. Box 563
San Bruno, Ca. 94066-0563

G.M.R.S. CALL SIGN KAC 2910

Signed:



President

Date:

14, May 1998

FEDERAL COMMUNICATIONS COMMISSION

My name is Kerry D. Cochran, I represent REACT of the Golden Gate Area, Inc. a Public Service Team. The organization is a licensed G.M.R.S. (General Mobile Radio Service) user, and repeater owner. We have been involved with G.M.R.S. and Wireless Communication for over 28 years. The organizations Call Sign is KAC 2910.

Mailing Address: P.O. Box 563 San Bruno, Ca. 94066-0563

We have serious concerns over the current NPRM, WT 98-20, and the impact it will have on the G.M.R.S. users, owners, and operators.

We are opposed to the proposed Universal Licensing System and the changes to the current Parts 95 Rules and Regulations. Under the proposal the changes, if adopted, would radically alter the G.M.R.S. operations as they currently exist.

The NPRM fails to acknowledge the significance of these additional proposed changes to the G.M.R.S. community.

We believe the if adopted, these radical changes in the licensing would eventually lead the FCC to again attempt to delicense this service, to which our members have opposed in the past and will oppose in the future.

We as a G.M.R.S. users are concerned about the consequences of these changes, and believe that the changes will lead to harmful interference to the users, owners, and operators of G.M.R.S. systems across the country.

The significant changes in the Parts 95 rules sections 95.29, 95.47, 95.53, 95.55, 95.75, 95.59, 95.121, 95.129, 95.135, 95.173, and 95.175 and elimination of these rules would negatively affect virtually every G.M.R.S. licensee.

Repeater operators would lose control over their stations, repeater owners would need to make complex and costly changes to prevent unauthorized access to their equipment.

This would discourage a GMRS users from accessing repeaters for Emergency Communications, and/or traveler assistance.

We have been providing the public, and the GMRS community with Emergency and community service communications via GMRS and the changes proposed would devastate our ability to provide this service.

The long-distance, hobby-type of Dxing of repeater by control stations would no longer be prohibited, repeater to repeater interference would increase.

We believe that it is critical to GMRS be self-coordination and self-regulation that the FCC continue to collect the types of information currently in the licensing database for all conventional base stations and for all repeaters.

The NPRM fails to address the issue of persons without the ability to access the FCC via a computer and/or the Internet. This deprives them the opportunity to file requests manually. This is **NOT** in the best interest of the public.

While consolidating the licensing process into one process may reduce redundant inconsistent, or unnecessary submission, this NPRM, does not address all concerns in the GMRS licensing and rules revisions areas.

While the NPRM may streamline the filing and record keeping process, of licensing, it does not eliminate the need and requirement to collect reliable licensing and ownership information that is now being collected. This current licensing

requirement is of the utmost importance for GMRS operators, repeater owners and system managers to self coordinate and to cooperate in interference elimination.

The GMRS community has long sought revisions in the licensing process and submitted several suggestions to the FCC officials about how a simplified licensing system could be implemented while retaining certain policies and protection that are in the current rules.

We strongly oppose this NPRM WT 98-20, and respectfully request that it be REJECTED and NOT BE APPROVED.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry D. Cochran", with a long horizontal flourish extending to the right.

**Kerry D. Cochran
President, REACT of the Golden Gate Area, Inc.
KAC 2910**